

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

LASONDRA DOWELL

v.

UNITED STATES OF AMERICA

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No. 3:16-cv-1479

CHIEF JUDGE CRENSHAW

**MOTION FOR LEAVE TO FILE RESPONSE TO GOVERNMENT'S
SUPPLEMENTAL BRIEF ON *DIMAYA***

Petitioner Lasondra Dowell respectfully moves for leave to file a response to the government's *Dimaya* supplement to address some issues discussed by the government beyond the strict scope of *Dimaya* and to bring a new Sixth Circuit decision to the Court's attention.

Respectfully submitted,

s/ Michael C. Holley

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CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2018, I electronically filed the foregoing Motion for Leave to File Response to Government's Supplemental Brief on *Dimaya* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Sunny A.M. Koshy, Assistant United States Attorney, 110 Ninth Avenue South, Suite A-961, Nashville, Tennessee 37203.

s/ Michael C. Holley

MICHAEL C. HOLLEY